

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE: WASHINGTON MUTUAL  
MORTGAGE BACKED SECURITIES  
LITIGATION

Master Case No.: C09-0037 (MJP)

CLASS ACTION

This Document Relates to: ALL CASES

PLAINTIFFS' UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENT

NOTICE ON MOTION CALENDAR:  
September 4, 2012

Lead Plaintiffs Doral Bank of Puerto Rico, Policemen's Annuity Benefit Fund of the City of Chicago, and Boilermakers National Annuity Trust (collectively, "Plaintiffs"), hereby move this Court for entry of an order (i) granting preliminary approval of the proposed Settlement set forth in the Stipulation of Settlement dated September 4, 2012; (ii) approving the form and manner of giving notice of the proposed Settlement to the Class; and (iii) setting a hearing date for final approval of the Settlement and all its terms and elements, including the proposed Plan of Allocation. Lead Counsel has conferred with Defendants' Counsel prior to filing this motion, and Defendants concur with and join in this motion.

This Motion is based upon the Stipulation of Settlement and all exhibits attached thereto; the [Proposed] Order for Notice and Hearing which provides for the preliminary approval of the

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1 Settlement and distribution of the Notice; all other pleadings and matters of record; and such  
2 additional evidence or argument as may be presented at the hearing.

3 Because all of the Parties to this action concur in the filing of this motion, they request  
4 that the Court approve it without a noticed hearing. Of course, should the Court desire more  
5 information, we will provide it immediately.

6 Accordingly, Plaintiff requests that the Court enter the [Proposed] Order for Notice and  
7 Hearing, a copy of which is attached hereto.

8  
9 Dated this 4th day of September, 2012 **SCOTT+SCOTT LLP**

10 /s/ Beth Kaswan

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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2012, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 4, 2012.

/s/ Beth Kaswan

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